

1401 Main Street, Suite 900 Columbia, SC 29201

> JOHN W. FLITTER DIRECTOR ELECTRIC & GAS REGULATION

December 1, 2008

The Honorable Charles L.A. Terreni Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29210

Re: Piedmont Natural Gas Company, Inc. (Piedmont) Petition dated November 25, 2008 requesting

Approval of Modification of Its Experimental Hedging Plan.

Docket No. 2001-410-G

Dear Mr. Terreni,

The South Carolina Office of Regulatory Staff ("ORS") has discussed this modification request with representatives of Piedmont Natural Gas Company regarding the above referenced matter. ORS has no objections to approval of the requested modification to its Experimental Hedging Plan in order to reduce the hedging "horizon" utilized under the Plan from twenty-four (24) months to twelve (12) months.

Thank you for the opportunity to comment on this matter.

Sincerely,

cc:

Dan F. Arnett John W. Flitter

Jane Lewis-Raymond, Esquire Jeremy C. Hodges, Esquire

David Carpenter Pia K. Powers